

# EXHIBIT B

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January 30, 2014

*Via electronic mail and U.S. Mail*

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Re: *Jacques Rivera v. Reynaldo Guevara, et al.*, No. 12 C 4428

Dear Counsel,

Pursuant to the Court's order of January 16, 2014, Plaintiff provides the Defendants the following list of 10 witnesses for trial:

1. Joseph Miedzianowski
2. Salvador Ortiz\*
3. Samuel Perez\*
4. Wilfredo Rosario\*
5. Luis Figueroa
6. David Velazquez
7. Jose Melendez\*
8. Edwin Davilla\*
9. Julio Sanchez\*
10. Robert Ruiz\*

All witnesses on this list, with the exception of Mr. Miedzianowski, have been disclosed previously. Please consider this letter a supplement to Plaintiff's previous witness disclosures and discovery responses. In addition, please note that Plaintiff reserves his right to question William Dorsch, who has been disclosed previously by all parties in the case, on any subject at trial.

Plaintiff does not by the above disclosure of trial witnesses limit his right to conduct written discovery and issue subpoenas relating to facts identified in the parties' responses to discovery—including facts identified in Plaintiff's First Supplemental Response to the First Sets of Interrogatories of Defendants Fallon, Gawrys, Guevara, Guzman, Leonard, McLaughlin, Mingey, Noon, Rinaldi, Zacharias, Weingart, Sparks, and the City of Chicago—or to rely upon those facts during discovery and at trial.

January 30, 2014  
*Rivera v. Guevara, et al.*  
All Counsel of Record  
Page 2 of 2

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Finally, please note that the witnesses above marked with an asterisk were deposed by the parties to this case during the *Juan Johnson v. Guevara, et al.* litigation. Given their prior deposition testimony, we trust that the parties will not need to re-depose these third parties in this case. If you disagree, please contact us at your soonest convenience to discuss the issue. Otherwise, we will assume that you will not issue subpoenas for these witnesses' depositions.

Do not hesitate to contact me with any questions that you may have. Thank you, as always, for your cooperation in this matter.

Sincerely,

A handwritten signature in blue ink, appearing to be 'SA' with a stylized flourish.

Steven Art

cc: Roderick MacArthur Justice Center